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January 23, 2020

By ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11021

Re: *The City of New York, et al. v. United States Postal Service, et al.,*
Case No. 1:19-cv-5934 (Cogan, J.)

Dear Judge Cogan:

Plaintiffs write to respectfully request a two-week extension, or until February 14, 2020, to respond to defendants' motion to dismiss (Doc No. 20), a request the Court noted at the pre-motion conference on December 18, 2019, that it would be inclined to grant. *See* Ex. A, H'rg Tr. at 25:17-21. The current deadline is January 31, 2020. No previous requests for extension of time have been made by plaintiffs. Plaintiffs also seek permission, pursuant to Your Honor's Individual Rules, to exceed the twenty-five (25) page limit set by this Court for memoranda of law. Plaintiffs respectfully request an enlargement of 10 pages for their memorandum of law in opposition to defendants' motion to dismiss, to a total of 35 pages. Both requests are made because defendants have offered a wide range of arguments regarding issues of first impression under the PACT Act.

Plaintiffs have conferred with counsel for defendants, and defendants consent to both requests.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

By: /s/ Hope Y. Lu
Hope Y. Lu
Assistant Corporation Counsel

cc: Counsel of record